

**THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

**ALTPASS LLC,**

Plaintiff,

v.

**FUJITSU AMERICA, INC.,**

Defendant.

**Civil Action No. 2:20-cv-00096-JRG-RSP**

**JURY TRIAL DEMANDED**

**JOINT MOTION TO STAY ALL PENDING DEADLINES  
AND NOTICE OF SETTLEMENT**

Plaintiff, Altpass LLC (“Plaintiff”) and Fujitsu America, Inc., (“Defendant”) (hereinafter collectively referred to as the “Parties”), have reached an agreement that resolves all claims asserted between them in the above-entitled and numbered action. The Parties expect to jointly file a dismissal with prejudice of all claims between them within 30 days. Accordingly, the Parties respectfully request that the Court stay all deadlines between them for 30 days, up to and including July 29, 2020. Plaintiff and Defendant request this stay, not for the purposes of any delay, but so that they may finalize the settlement agreement and file dismissal papers without incurring additional expenses.

DATED June 30, 2020.

Respectfully submitted,

By: /s/ Neal Massand

Neal G. Massand

Texas Bar No. 24039038

nmassand@nilawfirm.com

Timothy T. Wang

Texas Bar No. 24067927

twang@nilawfirm.com

Stevenson Moore V

Texas Bar No. 24076573

smoore@nilawfirm.com

**NI, WANG & MASSAND, PLLC**  
8140 Walnut Hill Ln., Ste. 500  
Dallas, TX 75231  
Tel: (972) 331-4600  
Fax: (972) 314-0900

**ATTORNEY FOR PLAINTIFF**  
**ALTPASS LLC**

By: /s/ Matthew Satchwell  
Matthew Satchwell  
Illinois Bar No. 6290672  
matthew.satchwell@dlapiper.com

**DLA PIPER LLP (US)**  
444 West Lake Street, Suite 900  
Chicago, IL 60606  
Tel: (312) 368-2111  
Fax: (312) 236-7516

**ATTORNEY FOR DEFENDANT**  
**FUJITSU AMERICA, INC.**

**CERTIFICATE OF SERVICE**

I hereby certify that on the 30th day of June, 2020, I electronically filed the foregoing document with the clerk of the court for the U.S. District Court, Eastern District of Texas, Marshall Division, using the electronic case filing system of the court. The electronic case filing system sent a "Notice of Electronic Filing" to the attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means.

/s/ Neal Massand  
Neal G. Massand